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THE HONORABLE BENJAMIN H. SETTLE

UNTIED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON TACOMA DIVISION

INDUSTRIAL TRAINING INTERNATIONAL LLC,

Plaintiff,

v.

CRANE INSPECTION & CERTIFICATION BUREAU, LLC,

Defendant.

Case No. 3:23-cv-05674-BHS

STIPULATED MOTION AND ORDER FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT

NOTE ON MOTION CALENDAR:

March 21, 2024

Without submitting to the jurisdiction of this Court, Defendant Crane Inspection & Certification Bureau, LLC ("CICB") files this Stipulated Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff Industrial Training International LLC's ("ITI") Complaint (the "Complaint") and would respectfully show as follows:

- 1. CICB's current deadline to answer or otherwise respond to the Complaint is March 29, 2024.
- 2. The parties are engaged in settlement negotiations and have therefore stipulated that CICB shall have up to and including May 31, 2024 to answer or otherwise respond to the Complaint.
- 3. Counsel for CICB has conferred with counsel for ITI with respect to the matters set forth in this motion. ITI has stipulated to the requested extension.

STIPULATED MOTION AND ORDER FOR EXTENSION OF TIME
[CASE No. 3:23-cv-05674-BHS]

Bracewell LLP 701 5th Avenue, Suite 3420 Seattle, WA 98104 206-204-6200 (t)

- 4. This request for extension of time to answer or otherwise respond is not for delay but for good cause and so that justice may be served. Specifically, CICB needs additional time to, among other things, analyze ITI's claims, continue settlement negotiations, and determine how to plead or otherwise respond.
- 5. This motion shall not constitute a waiver of any objection, claim, or defense regarding venue, jurisdiction, or otherwise that CICB may raise when answering or otherwise responding to the Complaint.

Accordingly, CICB, without submitting to the jurisdiction of this Court, respectfully requests that this Court grant this motion and allow CICB up to and including May 31, 2024 to answer or otherwise respond to the Complaint.

RESPECTFULLY SUBMITTED.

Dated: March 21, 2024 BRACEWELL LLP

/s/ Jeffrey E. Danley

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9			INDUSTRIAL INTERNATION	
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The Court has reviewed the parties' Stipulated Motion and finds it should be granted.

It is therefore ORDERED that Defendant Crane Inspection & Certification Bureau, LLC's time to answer or otherwise respond to the complaint is extended up to and including May 31, 2024.

> THE HONORABLE BENJAMIN H. SETTLE UNITED STATES DISTRICT JUDGE